



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-3

May 21, 1998

Frances M. Wylde, Treasurer  
Greenberg, Trauring, Hoffman, Lipoff,  
Rosen & Quentel, PA Political Action Cmte.  
1221 Brickell Avenue  
Miami, FL 33121

Identification Number: C00266585

Reference: March Monthly Report (2/1/98-2/28/98)

Dear Ms. Wylde:

This letter is to inform you that as of May 20, 1998, the Commission has not received your response to our request for additional information, dated April 22, 1998. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Neil Evans on our toll-free number (800) 424-9530 or our local number (202) 694-1130.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson", is written over the typed name.

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Frances M. Wylde, Treasurer  
Greenberg, Traurig, Hoffman, Lipoff,  
Rosen & Quentel, PA Political Action Committee  
1221 Brickell Avenue  
Miami, FL 33121

APR 22 1998

Identification Number: C00266585

Reference: March Monthly Report (2/1/98-2/28/98)

Dear Ms. Wylde:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The totals listed on Lines 11(d), 19, 20, 23, 30, and 31, Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B total. Please amend your report and any subsequent reports that may be affected by this correction.

-Your calculations for Lines 11(d), 19 and 20, Column A appear to be incorrect. Please provide the corrected totals on the Detailed Summary Page.

-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the frequency of deduction. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

A handwritten signature in black ink, appearing to be 'NE' or 'NG' with a stylized flourish.

Neil Evans  
Reports Analyst  
Reports Analysis Division

# PAYROLL DEDUCTIONS

SCHEDULE A ITEMIZED RECEIPTS		Use separate schedule for each category of the Schedule Summary Page	PAGE 11 OF 11
Contributions from Individuals			
Any information entered from each Receipt and Summary may not be used to claim any deduction for any purpose or to avoid paying taxes or to avoid any other tax liability. Other than using the name and address of any political committee to solicit contributions from such individuals.			
NAME OF COMMITTEE (in full) National Organization PAC 000000001			
A. Full Name, Mailing Address and ZIP Code		Name of Employer	
Anne Sullivan 21 18th Street City, State ZIP		National Organization, Inc.	
Employer for: <input type="checkbox"/> Other Name: <input type="checkbox"/> Primary: <input type="checkbox"/> Casual: <input type="checkbox"/>		Date report: 8/19/92	
		Amount of Cash Received: \$75.00	
		Amount of Cash Received: \$75.00	
B. Full Name, Mailing Address and ZIP Code		Name of Employer	
Rodney Jones 881 Main Street City, State ZIP		National Organization, Inc.	
Employer for: <input type="checkbox"/> Other Name: <input type="checkbox"/> Primary: <input type="checkbox"/> Casual: <input type="checkbox"/>		Date report: 8/19/92	
		Amount of Cash Received: \$120.00	
		Amount of Cash Received: \$120.00	

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

# Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paycheck during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor, 104.8(b).

**EXAMPLE:** During an election year, a corporate manager authorizes her employer to deduct \$12 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's contributions as "unitemized contributions" in its April and July quarterly reports. By June 30, the closing date for the July report, the manager's aggregate contributions are \$195 — still below the \$200 itemization threshold. By September 30 — the closing date for the October quarterly report — the manager's contributions reach \$225. Therefore, the committee itemizes the total contributions received from the manager during the third quarter (\$120), providing the year-to-date total in the appropriate space. (See Item A in the illustration above.)

# In-Kind Contributions

When determining whether to itemize an in-kind contribution, follow the same guidelines listed above under "When to Itemize Receipts." See Chapter 2 for information on how to determine the dollar value of an in-kind contribution.

In addition, add the value of the in-kind contribution to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104.13(a)(2).

If the in-kind contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at right!

# Appreciated Goods

When a committee receives an in-kind contribution whose value may

# IN-KIND CONTRIBUTIONS

SCHEDULE A ITEMIZED RECEIPTS		Use separate schedule for each category of the Schedule Summary Page	PAGE 11 OF 11
Contributions from Individuals			
Any information entered from each Receipt and Summary may not be used to claim any deduction for any purpose or to avoid paying taxes or to avoid any other tax liability. Other than using the name and address of any political committee to solicit contributions from such individuals.			
NAME OF COMMITTEE (in full) National Organization PAC 000000001			
A. Full Name, Mailing Address and ZIP Code		Name of Employer	
Martin L. Krue 4 River Road City, State ZIP		National Organization, Inc.	
Employer for: <input type="checkbox"/> Other Name: <input type="checkbox"/> Primary: <input type="checkbox"/> Casual: <input type="checkbox"/>		Date report: 8/19/92	
		Amount of Cash Received: \$5,000.00	
		Amount of Cash Received: \$5,000.00	

SCHEDULE B ITEMIZED DISBURSEMENTS		Use separate schedule for each category of the Schedule Summary Page	PAGE 11 OF 11
Operating Expenditures/Other Federal			
Any information entered from each Receipt and Summary may not be used to claim any deduction for any purpose or to avoid paying taxes or to avoid any other tax liability. Other than using the name and address of any political committee to solicit contributions from such individuals.			
NAME OF COMMITTEE (in full) National Organization PAC 000000001			
A. Full Name, Mailing Address and ZIP Code		Name of Disbursement	
Martin L. Krue 4 River Road City, State ZIP		Raffle prize	
Disbursement for: <input type="checkbox"/> Other Name: <input type="checkbox"/> Primary: <input type="checkbox"/> Casual: <input type="checkbox"/>		Date report: 8/19/92	
		Amount of Cash Disbursement: \$5,000.00	
		Amount of Cash Disbursement: \$5,000.00	

Itemize in-kind contributions on both Schedules A and B so as not to inflate the cash-on-hand amount.

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